

### **REMARKS/ARGUMENTS**

Claims 1-54 are pending and at issue in the present application; claims 43-54 having been added by this amendment.

Applicants have amended the title to read "Book Production Device with Demand Printer and Method of Producing Books."

Applicants traverse the rejections of the claims at issue as anticipated by Dooley, Graushar or Weller or as obvious over varying combinations of such patents and Warmus et al.

Claim 1, as amended, and claims 2-22 dependent thereon, recite book production apparatus including a gathering line operable during a single, continuous production sequence and a demand printer operable during a single production sequence for producing first and second different printed pages in response to print commands issued during the production sequence. The demand printer prints customized content on at least a portion of at least one of the pages without limitation as to position and orientation of the customized content over an entire surface of the at least one page. A feeding device is operable to feed the printed pages to the gathering line and a controller coordinates simultaneous issuance of the print command to the demand printer and operation of the gathering line, the demand printer, and the feeding device during a single production sequence to produce books.

Claim 23, and claims 24-35 and 43-48 dependent thereon, as amended, specify print production apparatus including a gathering line operable during a production sequence and a demand printer for producing first and second pages each having customized content that is disposed in an orientation at a position on a surface thereof. The first and second pages are printed during a time interval during which the gathering line is continuously moving. The demand printer includes means for printing the customized content on at least a portion of each page without limitation as to the orientation and position of the customized content over an entire surface of the page. A feeding device is operable to feed the customized pages to the gathering line and a controller coordinates operation of the gathering line, the demand printer, and the feeding device during the production sequence to produce customized books.

Claims 36-42 and 49-54 recite a method of producing books including the steps of supplying a gathering line, a demand printer for producing first and second pages at least one of which has customized content printed on at least a portion thereof without limitation as to position and orientation of the customized content over an entire surface of the at least one page

in response to print commands generated during a continuous production sequence, and further supplying a feeding device. The method also includes the step of coordinating simultaneous operation of the gathering line, the demand printer, and the feeding device during a production sequence to produce the books.

None of the art cited by the examiner discloses or suggests book production apparatus including a demand printer operable during the single production sequence to produce different printed pages in response to print commands issued during a single continuous production sequence, wherein the demand printer prints customized content on at least a portion of at least one of the pages without limitation as to position and orientation of the customized content over an entire surface of the at least one page together with a controller that coordinates simultaneous issuance of the print commands to the demand printer and operation of a gathering line, the demand printer, and a feeding device during the single production sequence, as recited by claims 1-22.

Further, none of the prior art cited by the examiner discloses or suggests book production apparatus including a demand printer for producing first and second different pages each having customized content that is disposed in an orientation at a position on a surface thereof, wherein the first and second pages are printed during a time interval during which a gathering line is continuously moving and wherein the demand printer includes means for printing the customized content on at least a portion of each page without limitation as to the orientation and position of the customized content over an entire surface of the page together with a controller that coordinates operation of the gathering line, the demand printer, and a feeding device during a production sequence to produce customized books, as recited by claims 23-35 and 43-48.

Still further, none of the art cited by the examiner discloses or suggests a method of producing books including the step of supplying a demand printer for producing first and second pages wherein at least one of the pages has customized content printed on at least a portion thereof without limitation as to position and orientation of the customized content over an entire surface of the at least one page together with the step of coordinating simultaneous operation of a gathering line, the demand printer, and a feeding device during a production sequence to produce books. These steps are recited by claims 36-42 and 49-54.

In fact, each of Dooley, Graushar, and Weller discloses the use of customization printers that are fixed in position during a print job. While these customization printers may be movable

(i.e., repositionable) between print jobs, it is clearly the case that each of these customization printers is capable of printing in only a selected position and orientation during a particular print job, and none of these customization printers is capable of printing without limitation as to position and orientation of customized content over an entire surface of a printed page in response to print commands issued or generated during a production sequence.

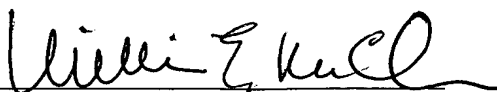
Because none of Dooley, Graushar or Weller discloses or suggests each of the elements recited by the claims at issue, it follows as such claims are not anticipated thereby. Further, because such art does not disclose or suggest that it would be desirable or even possible to combine the features of one with features of one or more of the others to arrive at the subject matter recited by the independent claims at issue, it follows that such claims are not obvious thereover. The subject matter recited by the claims at issue result in a degree of variability not contemplated by the prior art and there is simply no motivation to combine the features as recited. The prior art must disclose at least an incentive for the claimed combination of elements in order for a *prima facie* case of obviousness to be established. See the remarks presented in applicants' Amendment A of record in the present application including the cases cited therein.

Further, because the dependent claims at issue incorporate the subject matter of the respective independent claims, it follows that the dependent claims are also allowable for the reasons presented above.

For the foregoing reasons, reconsideration and withdrawal of the rejections of the claims and allowance thereof are respectfully requested.

Respectfully submitted,

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